

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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*This document relates to:*  
All Actions

**DECLARATION OF JAMES GAVIN SIMPSON REGARDING EXECUTION OF  
THIS COURT’S JUNE 9, 2021 HAGUE CONVENTION REQUEST TO  
THE UNITED KINGOM AND EVIDENTIAL MATERIALS THUS OBTAINED**

I, James Gavin Simpson, declare under penalty of perjury, as provided by 28 U.S.C. § 1746, as follows:

1. I am an attorney duly admitted before this Court, am Of Counsel to the firm of Kreindler & Kreindler LLP, attorneys for Plaintiffs in *Ashton v. Kingdom of Saudi Arabia*, 19-cv-2003, 03-mdl-1570 (S.D.N.Y.) (GBD) (SN), and am familiar with this litigation and the relevant prior proceedings.

2. I respectfully submit this Declaration on behalf of the Plaintiffs to update the Court regarding the execution of the June 9, 2021 Request to the United Kingdom Pursuant to the Hague Convention of 18 March 1970 on Taking of Evidence Abroad in Civil or Commercial Matters (“Hague Convention Request”) (ECF 6384-1, 6858). The Request sought to obtain copies of evidential holdings from the Metropolitan Police Service at New Scotland Yard in London, UK (“MPS”) related to Saudi government employee Omar al-Bayoumi.

3. This Declaration supplements my Declaration dated May 9, 2025, ECF 10948-1, in which I notified this Court that the MPS had produced a third tranche of materials responsive to the Hague Convention Request. I described the processes related to that production, ensured its

filing with the Court and service on the parties, and provided a copy of the signed and initialed “Schedule of Relevant Material 2025” that signified the MPS handover of this third tranche (the “MPS 2025 Production”). ECF 10948, ECF 10948-1, -2, -3, -4.

4. One line item on the “Schedule of Relevant Material 2025,” URN MPS2025-023, was described as having been “submitted for copying and await[ing] completion by MPS Digital Exploitation Unit,” and accordingly it was marked on the schedule as “Not Yet Disclosed” with a note that the “Exhibit will be provided in due course.” ECF 10948-3 at 3.

5. On June 27, 2025, the MPS provided to Plaintiffs the material so identified in the line item at URN MPS2025-023 (i.e. “Exhibit PSS/103 – Quantity of Floppy Discs – Seized from the Garage at 34 Dymoke Street”) in digital form by means of one 64GB USB flash drive labelled “MPS 2025-068, Exhibit NES/4.” I have reviewed the content of this evidential production as it has been received, and I have initialed the two corresponding lines of the accompanying “Schedule of Relevant Material 2025 – Annex 1” together with an MPS officer. A true and accurate copy of the signed and initialed MPS “Schedule of Relevant Material 2025 – Annex 1” is attached hereto as Exhibit A.

6. Under my supervision, my office has created exact copies of “MPS 2025-068, Exhibit NES/4” mirroring the original production and maintaining its format on one 64GB USB flash drive. *See* Exhibit B hereto, image of flash drive along with its packaging. To maintain the integrity of this production, we have today filed under seal with the Court, pursuant to the terms of the MDL Protective Order, ECF 1900, one 64GB USB flash drive labelled “MPS 2025-068, Exhibit NES/4” (matching the MPS evidentiary markings).

7. Today’s submission of responsive materials to the Sealed Records department of the U.S. District Court for the Southern District of New York represents Plaintiffs’ continued

compliance with the terms of the MDL Protective Order and the Letters Rogatory, which directed that all certified copies of materials responding to the Hague Convention Request be “lodge[d] ... with the United States District Court without delay ... .” ECF 6834-1 at ¶ 10.

8. Along with the Plaintiffs’ Executive Committees, we will provide defense counsel with copies of the material on the flash drive as quickly as possible. We will also provide a courtesy copy to the Department of Justice.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in New York, New York on June 27, 2025

/s/ James Gavin Simpson  
James Gavin Simpson, Esq.